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April 27, 2016

VIA E-FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Room TW-A325
Washington, DC 20554

Re: WC Docket No. 10-90 - Comments of Helix Telephone Company

Dear Ms. Dortch:

This letter is being filed on behalf of Helix Telephone Company (Helix). In this letter Helix raises a challenge to the listing of unsubsidized competitors for the purpose of the Alternative Connect America Cost Model (A-CAM) as the challenge process is set out in DA 16-378. This challenge concerns census block 410599504001042 (the "Census Block"). This Census Block is served by Helix as an incumbent local exchange carrier.

Based on 477 filings, two entities are listed as providing service in the Census Block in addition to Helix Telephone Company. One is StarTouch Broadband. The second is Eastern Oregon Telecom, LLC (EOT).

As to StarTouch Broadband, it does not provide voice service. StarTouch Broadband is an Internet only provider. Attached as part of Exhibit 1 are screen shots from StarTouch Broadband's web site that show the services offered by StarTouch Broadband. In addition, Mr. James A. Rennard of GVNW, Inc. called StarTouch Broadband on behalf of Helix on April 19, 2016. There, he spoke with a representative of StarTouch Broadband who confirmed that StarTouch Broadband does not offer voice service. Please see Exhibit 1, which includes Mr. Rennard's Declaration.

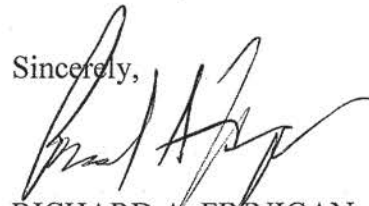
EOT was also contacted by Mr. Rennard. After conferring with EOT, EOT indicated that it did not offer voice service in the Census Block. Attached as Exhibit 2 is a letter from EOT confirming that fact and noting that the Census Block was included in its FCC Form 477 in error.

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There are three other entities that are listed as providing service to the Census Block. They are GCI Communications Corp., HNS License Sub, LLC and VSAT Systems, LLC. These three entities are all satellite providers and are not considered entities that constitute a qualified unsubsidized competitor.

Based on the foregoing and the attached, Helix respectfully requests that the Federal Communications Commission modify A-CAM v2.2 and the final version of the A-CAM to reflect the fact that the Census Block is not served by qualifying unsubsidized competitor.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs
Enclosure

cc: Client (via e-mail)